

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 08 CR 549
v.)	
)	
TONY CALLION, also known as "Tone,")	Judge David H. Coar
DANIEL GIBBS,)	
ISRAEL COLLINS,)	
SHERMAN SWOPES,)	
HAL DURHAM, and)	
NATALIE HOISINGTON)	

AGREED PROTECTIVE ORDER

Upon the agreement of counsel for the government and counsel for defendant, it is hereby ORDERED as follows:

1. Medical records for Individual B produced by the United States remain the property of the United States. Upon conclusion of the trial of this case and any direct appeals of this case or upon the earlier resolution of the charges against defendant, all of the materials and all copies made thereof must be destroyed or maintained under secure conditions by defense counsel, unless there is a specific request by the government for the return of particular materials.
2. Before producing materials containing individually identifiable health information, the government will designate such materials as confidential by affixing "CONFIDENTIAL HEALTH INFORMATION—SUBJECT TO PROTECTIVE ORDER" to the material itself or to the diskette or CD-Rom containing the material.
3. Except when being actively examined for the purpose of the preparation of the defense's case, defense counsel shall maintain the protected material in a locked, safe, and secure

drawer, cabinet, safe, or room which is accessible only to defense counsel. Defense counsel shall not permit any person access of any kind to the protected materials except as set forth below.

4. Before providing the materials to an authorized person, defendant's counsel must provide the authorized person with a copy of this Order and require the authorized person to sign a statement that represents that the authorized person has received a copy of and reviewed this Order and has agreed to be bound by its terms and conditions subject to sanctioning by the Court for any violations of this Order. Defense counsel shall maintain a copy of the signed statement of each authorized person for a period of twelve months after the later of: (a) the trial or other resolution of this case; and (b) any direct appeal. Defense counsel shall make the signed statements of each authorized person available to the government as required by the Federal Rules of Criminal Procedure, the local criminal rules of the Northern District of Illinois and/or Court order.

5. A copy of this order shall be maintained with the protected material at all times.

6. Counsel should make every effort to redact the individually identifiable health information that is included in pleadings. In addition, any pleadings in which it is necessary to include or make reference to such information shall be filed under seal.

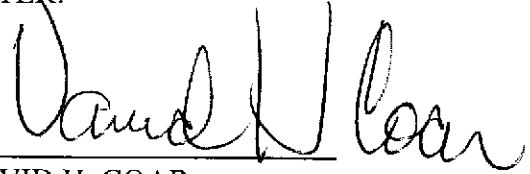
7. These materials shall not be copied or reproduced by defense counsel or defendant either directly or indirectly unless they are copied for use by authorized persons to assist in the defense, and in that event, such copies and reproductions must be treated in the same manner as the original matter.

8. The restrictions set forth in this Order do not apply to the United States or documents that are (or become) public record.

9. This Order may be modified by the agreement of the parties with permission of the Court or by further Order of the Court.

10. Each party reserves all other rights relating to discovery and the production of documents, including the right to petition the Court to construe, modify, or enforce this Order.

ENTER:

A handwritten signature in black ink, appearing to read "David H. Coar", written over a horizontal line.

DAVID H. COAR
U.S. District Judge

Dated:

8/19/2009